

COURT OF COMMON PLEAS  
HAMILTON COUNTY, OHIO



JOHN KLOSTERMAN

Case No. A1905588

Defendant,

Judge Wende C. Cross

V.

CITY OF CINCINNATI.  
HCLRC,

( MOTION TO DISQUALIFY MAGISTRATE  
( ANITA BERDING

Plaintiffs.,

FILED  
1 2023 APR 18 A 8:05  
CLERK OF COURTS  
HAMILTON COUNTY OH  
COMMON PLEAS

Now comes John Klosterman, Defendant pro se in the above-captioned case; and respectfully moves this Court to disqualify Anita Berding, the Magistrate currently assigned to this case.

Your Honor, I, John Klosterman, respectfully request that Magistrate Berding be disqualified from this case on the grounds of bias and prejudice. For example, (exhibit a-d) Magistrate Berding has dismissed defendants motions that included clear and compelling evidence that supports them. The HCLRC filed for a hearing and was granted without hesitation, that hearing resembles most all of defendants request

They asked for more time to review ( audit) of books and work completed (audit). "How much time do you need/want" asked Magistrate Berding. They prevail where defendant did not. They offered that they were arrested by the FBI like defendant had, and stated that during "due diligence" housing was a disaster. Granted.

Defendant has included dozens of pages as evidence to support a hearing. None were were granted beginning 33 months ago. There is prejudice here.

Defendant has asked the magistrate to compel the receiver to produce the bank statements that have not been seen in 3 years. They are REQUIRED as standard accounting for receivers in their reporting. The bidders names and the amounts bid were to be disclosed th Robert Linnaman. They were not produced. It was a fraudulent sale. All the plaintiffs are hiding

EXHIBIT

24

behind the Magistrate, knowing that she will, like the past give overwhelming consideration to them and dismiss or deny the any motion brought by the defendant. He is respected, but defendant is not.

This pattern of behavior finally leads defendant to believe that Magistrate Berding is biased against the defendant and is not applying the law fairly and impartially.

This case began simply. Assign a receiver for the properties, who would hire a licensed Real Estate Management company. The court ordered a plan be developed and a budget. It was never produced. Maintain existing rental units 12 and ready 5 "rental flips" and complete 4 others that were from 60 -70 % complete that were to be completed and made ready to sell. Maintain 40 lots. It was said to take no more than 4 months. In that time the titles were to be examined and cleared of any liens.

Hire an experienced real estate company to advertise and conduct the sale by creating a typical boilerplate sales document with qualification modifications made by the City. Schedule the sale for July 2020. Sell the properties at the height of the house sales boom. Pay the judgment and other expenses and close the case.

What happened? Why are we at month 36? The defendant knows exactly why. TSO had money to launder, wire and bank fraud to commit, two enterprise to run. One, to launder ill gotten money from the Government's PPP fund. The requirements were lots of employees and a large pool of work. The more the payroll the more money could be extracted from the government. Mr. Lentine needed the project to go as long as he could make it last. He fabricated work constantly. Work done previously by defendant. Made excuses to justify not being able to put together 4 units that needed more than 2-3 thousand dollars that 5 units needed to rent, which he accomplished. So he slapped rentals together. He billed for hundreds of thousand in labor, material, that have no receipts for and payments to fake employees as the FBI's arrest report states in Federal case # 1:21mj633. Defendant made the court and the receiver aware. Nothing.

Mr Lentine would still be there had Mr. Boydston not been forced to fired TSO. The other enterprise was to run the management company in the background and provide legal cover for Mr. Lentine.

So, who is to blame for TSO having spent over \$500,000.00 from rents, tenants deposits, rental assistance payments, in the tens of thousands of dollars, and stating in reports to have paid over \$70,000.00 in withholding taxes when none were paid, but billed to the receiver. This includes the "over Budget" amount of \$157,000.00, which has NO documents to back it up.

Had it not been for the HCLRC questioning ONLY the bill submitted by Mr. Lentine, or defendant questioning both bills sent by Mr. Boydston, Konza LLC and Mr. Lentine, payment would have been made.

Over 100% of Mr. Lentine's should be rejected due to no records, invoices or bank statements. Konza, LLC's invoice show double billing. (exhibit e), and should be rejected for no bank statements have ever been produced. And finally Mr. Boydston hired Mr. Lentine as evidenced by his billing memo on 5/13/2020 proving that defendant never had an agreement, nor has either Mr. Lentine or Mr. Boydston produced one that proves Mr. Boydston's allegation that defendant hired TSO. (So he could not fire him?) Its the ostrich denial. Legal Billings from Mr. Boydston submitted for payment are fraudulent (exhibit e) He billed extensively for work unrelated to being the "manager of Konza, LLC." Mr. Boydston providing legal cover for Mr. Lentine. Mr. Boydston did most of the work that should have been provided by a licenced Real Estate management company which TSO was not. Mr. Boydston was glad to provide the services thru Konza LLC, for an additional \$200,000.00 in legal fees. Mr. Boydston billed \$159,687.00 and \$61,633.00 for cash advances that he has provided no proof of having infused that amount personally. Defendant alleges that Lentine and Boydston shared the spoils and little or no funds came from Mr. Boydston. Would any attorney pay mortgages for 3 years totaling over \$35,000.00? Is the court and the defendant that dim witted to believe that falsehood. Bank statements have been requested in motions for those statements and they have been denied before and the most recent motion asks one again. They will be denied. The Total : \$500,000.00. Where are the bank Statements for TSO, Konza, LLC and Mr. Boydston? Where are the W2's from 2020,21,22 and 23? All have been requested in the past and denied.

The court is in receipt of all the fraudulent management reports, legal fees from Konza, LLC and Mr. Boydston along with more bills unpaid by Mr. Lentine and his "over budget" amounts. Total fees: \$1,150,000.00 which was spent on 5 - rental flips and 4 -units 60-70 % complete and maintenance 35 empty lots and 12 "B" grade units. The alleged fraudulent sale was sold to the planned bidder for \$1,470,000.00. Over 100% under bid as stated by Mr. Lentine. (which is correct) But HCLRC got an inside track and looked at the disaster and there "Due Diligence" reporting gave a poor report on the conditions of all the buildings. They then submitted their bid which now must include the \$88,000.00 uninsured fire at 652 Steiner. It is estimated to be in the range of \$300,000.00.

The sub. Total bottom line:  $\$1,150,000.00 / 9 = \$127,777.00$  per unit. Now add the \$300,000.00 for shotty workmanship and fire damage of \$88,000.00, and the new total is \$1,450,000.00! So,  $\$1,450,000.00 / 9 = \$161,111.00$  per unit! Labor/material/expences and legal. Defendant could BUILD 9 houses for that amount.

The original defendants judgment was in about \$550,000.00. How did the plaintiffs submitted figure (without any required accounting controls get to \$1,450,000.00 or \$900,000.00 over budget? The answer is that Magistrate Anita Berdings prejudice and bias toward defendant to take action on the run-away receivership when asked to do so in motions by defendant.

And then for the HCLRC to file a separate suit against defendant in Judge Luebbers court and then attempted to transfer the action back to Magistrate Berdings court where her court is familiar with the case. To think that their arrogant strategy to send it back to a court where all past and current plaintiffs have received differential treatment is laughable, given Magistrate Berdings prejudiced toward the defendant. HCLRC desire to halt the run-away train by silencing defendants constitutional property rights is outrageous.

## CONCLUSION

Defendant has received independent reports that empty rental units are unsecured and are being ransacked. Only 3 of the over a dozen original tenants remain. The average tenant rental retention rate by the defendant was 3.4 years. Now management reports show a 200% turn over rate in less than 3 years for TSO and the receivership. Poor tenant background checks, poor maintenance and neighborhood decline surely have everything to do with the turnover. And now, the Receiver has fired TSO and has ordered the removal of most all the tenants!

What was Konza, LLC doing for three years besides collecting legal fees. The neighborhood has failed to move to the next step in its revival that defendant began nearly 40 years ago. Defendant can be credited with saving 24 buildings from imminent decline and destruction. Both the City and all the plaintiffs would prefer to place the blame of this neighborhood disaster at Mr. Klosterman's doorstep by suggesting that his court delays were the reason for it. The opposite is true.

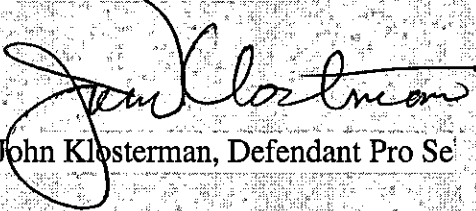
For over 70 years, Sedamsville has been the stepchild of the City and only provided lip service to the politically inept community council. Then, the City gets a golden egg laid at here feet and they blew it! They hired an alleged respected attorney, who created a Receiver, Konza, LLC, he then hired Tristate Organization Inc, which was run by a convicted financial felon. And Mr. Boydston's legal billing records show he reviewed TSO, had not one, but an amended 2nd agreement with Mr. Lentine, but blames defendant for TSO. Then, the City allowed the growing disaster to grow, the FBI arrest of Lentine and Strunk only compounded the cover up. How and why could they allow a 4 mont project to continue for 3 years? Only a pledged idiot could say the the neighborhood benefited from both TSO and the receivership. Defendant has photographic evidence of every building before the receivership took over. It will be breathtaking when the final bill is tallied on the damage not only to the building but to the



community as a whole. There are a gaggle of people who colluded in this disaster. Did Magistrate Berding's bias and prejudice toward defendant add to the disaster? Defendant, sadly says, yes.

Your Honor, defendant respectfully requests that a hearing be ordered or that this case be assigned to a magistrate who has experience in complex real estate matters, to ensure that the case is heard by someone with the knowledge and expertise necessary to understand the nuances of this now complex case.

Respectfully submitted,



John Klosterman, Defendant Pro Se

[johncklosterman@gmail.com](mailto:johncklosterman@gmail.com)

513-250-2510

All parties have been served via Email

Dentons Bingham Greenebaum LLP

 Invoice No.: \*\*\*\*\*  
 Invoice Date: December 2, 2022  
 Page 29

 Konza LLC  
 131170.000002

 Exhibit - E(4)  
 12/5/22  
 revision

## Work performed by Konza LLC as Receiver

DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
09/28/21	RB	Phone conference Joseph Lentine; review operating charts	0.40	140.00
10/12/21	RB	Prepare for and attend hearing on all motions before Magistrate Berding; edit magistrate's decision on receiver's sale motion and sale terms and procedures; emails Jaci Martin and Tina Woods; office conference Joseph Lentine and Angel Strunk; check church security; phone conferences Joseph Lentine	2.00	700.00
10/13/21	RB	Edit magistrate's decision on sale motion; emails Jaci Martin and Tina Woods; review 3 John Klosterman filings; phone conferences Joseph Lentine	1.50	525.00
11/14/21	RB	Meeting Charles Wanamaker at 637 Steiner; properties drive by; edit GCWW chart; email Joseph Lentine	0.10	35.00
02/02/22	RB	Phone conferences Kim Knoppe, Jennifer Donathan and Joseph Lentine; drive by properties; edit insurance chart; email Mr. Lentine	1.00	350.00
03/03/22	RB	Phone conferences and emails Joseph Lentine; office conference Mr. Lentine and Angel Strunk; properties	0.20	70.00
03/04/22	RB	Phone conference and emails Joseph Lentine; phone conference Jaci Martin; update operations charts; arrange for filing and service of receiver's report; emails Angel Strunk; draft Port sale outline	1.20	420.00
03/21/22	RB	Meeting George Wallace and attend to clean out of 639 Steiner; properties drive by; office conference Joseph	0.50	175.00
03/22/22	RB	Draft letter to GCWW; phone conferences Marty Arlinghaus and Joseph Lentine	0.50	175.00
03/25/22	RB	Phone conference and emails Yvette Hanley; emails Jennifer Donathan; phone conferences Jaci Martin and Joseph Lentine; overnite letter to GCWW; review John Klosterman and City filings	1.00	350.00
03/28/22	RB	Phone conference Joseph Lentine; emails Joshua Carlton	0.20	70.00
03/29/22	RB	Phone conference Joseph Lentine; email Yvette Hanley; email Tim Oakes	0.30	105.00
03/30/22	RB	Office conference Joseph Lentine and Angel Strunk; properties drive by; read John Klosterman 3/29/22 filings; phone conference Mr. Lentine	0.30	105.00
03/31/22	RB	Phone conference Joseph Lentine; emails Jennifer Donathan Kelly Allesee, Melissa Darby and Angel Strunk	0.20	70.00
04/01/22	RB	Phone conferences Jaci Martin and Joseph Lentine; emails David Boe and Yvette Hanley	0.40	140.00
04/04/22	RB	Office conference Joseph Lentine and Angel Strunk and with Jennifer Donathan; properties drive by; emails Jennifer Donathan; email David Boe; emails Matthew Strauss and Kim Knoppe	1.00	350.00
04/05/22	RB	Office conference Joseph Lentine; properties drive by; edit offer solicitation package; emails Matthew Strauss,	0.50	175.00
04/06/22	RB	Phone conferences and emails Joseph Lentine; emails and phone conference Matthew Strauss; review CAA landlord statements; arrange filing and service of 25th Receiver's Report; phone conference and emails Jennifer Donathan; edit offer solicitation package	1.00	350.00

date	description	time	amount
9/28/21	phone conference Joseph Lentine; review operating charts	.60	180.00
10/12/21	prepare for and attend hearing on all motions before Magistrate Berding; edit magistrate's decision on receiver's sale motion and sale terms and procedures; emails Jaci Martin and Tina Woods; office conference Joseph Lentine and Angel Strunk; check church security; phone conferences Joseph Lentine	2.00	600.00
10/13/21	edit magistrate's decision on sale motion; emails Jaci Martin and Tina Woods; review 3 John Klosterman filings; phone conferences Joseph Lentine	1.00	300.00
11/14/21	meeting Charles Wanamaker at 637 Steiner; property drive by; edit GCWW chart; email Joseph Lentine	1.00	300.00
2/2/22	phone conferences Kim Knoppe, Jennifer Donathan and Joseph Lentine; drive by properties; edit insurance chart; email Mr. Lentine	1.50	450.00
3/3/22	phone conferences and emails Joseph Lentine; office conference Mr. Lentine and Angel Strunk; properties drive by; email Matthew Strauss	1.80	540.00
3/4/22	phone conference and emails Joseph Lentine; phone conference Jaci Martin; update operations charts; arrange for filing and service of receiver's report; emails Angel Strunk; draft Port sale outline	2.00	600.00
3/21/22	meeting George Wallace and attend to clean out of 639 Steiner; properties drive by; office conference Joseph Lentine; emails Angel Strunk; emails Vicki Asbury; letter and delivery to David Boe; email Philip Denning	3.00	900.00
3/22/22	draft letter to GCWW; phone conferences Marty Arlinghaus and Joseph Lentine	1.10	330.00
3/25/22	phone conference and emails Yvette Hanley; emails Jennifer Donathan; phone conferences Jaci Martin and Joseph Lentine; overnite letter to GCWW; review John Klosterman and City filings	1.50	450.00
3/28/22	phone conference Joseph Lentine; emails Joshua Carlton	.20	60.00
3/29/22	phone conference Joseph Lentine; email Yvette Hanley; email Tim Oakes	.40	120.00
3/30/22	phone conference Joseph Lentine; emails Jennifer Donathan Kelly Allesee, Melissa Darby and Angel Strunk	1.70	510.00
3/31/22	phone conference Joseph Lentine; emails Jennifer Donathan Kelly Allesee, Melissa Darby and Angel Strunk	.50	150.00
4/1/22	phone conferences Jaci Martin and Joseph Lentine; emails David Boe and Yvette Hanley	.40	120.00
4/4/22	office conference Joseph Lentine and Angel Strunk and with Jennifer Donathan; properties drive by; emails Jennifer Donathan; email David Boe; emails Matthew Strauss and Kim Knoppe	1.50	450.00
4/5/22	office conference Joseph Lentine; properties drive by; edit offer solicitation package; emails Matthew Strauss, GCWW and Angel Strunk	1.50	450.00
4/6/22	phone conferences and emails Joseph Lentine; emails and phone conference Matthew Strauss; review CAA landlord statements; arrange filing and service of 25th Receiver's Report; phone conference and emails Jennifer Donathan; edit offer solicitation package	2.50	750.00

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Konza LLC  
131170.000002Invoice No.: \*\*\*\*\*  
Invoice Date: December 2, 2022  
Page 2912/5/22  
revisionWork performed by Konza LLC as Receiver

DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
04/07/22	RB	Emails and phone conferences Joseph Lentine; emails Matthew Strauss; emails and phone conferences Katrina Godbey	0.30	105.00
04/08/22	RB	Phone conferences, emails and meeting with Joseph Lentine; properties drive by; emails Matthew Strauss; phone conference and emails Kim Knoppe; phone conferences Philip Denning and Jaci Martin	1.30	455.00
04/11/22	RB	Phone conference and emails Joseph Lentine and Jennifer Donathan; properties drive by; emails Matthew Strauss; phone conferences Jaci Martin; edit marketing materials; meeting Tim Oakes and Mr. Lentine	1.00	350.00
04/12/22	RB	Phone conferences Joseph Lentine and Jennifer Donathan; review and edit Listing Agent agreement	1.00	350.00
04/26/22	RB	Phone conferences and emails Joseph Lentine; internal conferences on locating emails in response to John Klosterman demand	1.00	350.00
06/16/22	RB	Phone conferences Joseph Lentine; draft motion to approve sale	0.60	210.00
06/17/22	RB	Phone conferences Joseph Lentine and Kate Burroughs, Erica Faaborg and Shannon Price; office conference Mr. Lentine; properties drive by	0.50	175.00
06/21/22	RB	Phone conferences Marty Arlinghaus and Joseph Lentine	0.20	70.00
06/22/22	RB	Phone conferences Dial One, Jennifer Donathan and Joseph Lentine; attend 637 Steiner alarm	0.20	70.00
06/23/22	RB	Phone conferences Jennifer Donathan, Dial One, George Wallace, Kelly Alsesee, Joseph Lentine	0.10	35.00
06/24/22	RB	Phone conferences George Wallace, Dial One, Joseph Lentine and Shannon Price and Erica Faaborg; meeting with Randy Williams and attend to GCWW payment; voicemails Mary Lee Bosom; emails Mr. Williams and Melissa Darby	0.20	70.00
06/27/22	RB	Attend to Dial One work at 637 Steiner	0.10	35.00
06/28/22	RB	Phone conference Joseph Lentine; email Ted Gable	0.10	35.00
06/29/22	RB	Phone conferences Joseph Lentine, Kelly Alsesee and Jennifer Donathan	0.50	175.00
06/30/22	RB	Conference Joseph Lentine; properties drive by	0.10	35.00
07/01/22	RB	Emails Kelley Alsesee and Jennifer Donathan; review Port purchase contract; phone conferences Joseph Lentine	0.50	175.00

date	description	time	amount
4/7/22	emails and phone conferences Joseph Lentine; emails Matthew Strauss; emails and phone conferences Katrina Godbey	1.20	420.0
4/8/22	phone conferences, emails and meeting with Joseph Lentine; properties drive by; emails Matthew Strauss; phone conference and emails Kim Knoppe; phone conferences Philip Denning and Jaci Martin	2.50	750.00
4/11/22	phone conference and emails Joseph Lentine and Jennifer Donathan; properties drive by; emails Matthew Strauss; phone conferences Jaci Martin; edit marketing materials; meeting Tim Oakes and Mr. Lentine	2.50	750.00
4/12/22	phone conferences Joseph Lentine and Jennifer Donathan; review and edit Listing Agent agreement	1.00	300.00
4/26/22	phone conferences and emails Joseph Lentine; internal conferences on locating emails in response to John Klosterman demand	.20	0
6/16/22	phone conferences Joseph Lentine; draft motion to approve sale	.10	30.00
6/17/22	phone conferences Joseph Lentine and Kate Burroughs, Erica Faaborg and Shannon Price; office conference Mr. Lentine; properties drive by	1.50	450.00
6/21/22	phone conferences Marty Arlinghaus and Joseph Lentine	.20	60.00
6/22/22	phone conferences Dial One, Jennifer Donathan and Joseph Lentine; attend 637 Steiner alarm	1.50	450.00
6/23/22	phone conferences Jennifer Donathan, Dial One, George Wallace, Kelly Alsesee, Joseph Lentine	.30	90.00
6/24/22	phone conferences George Wallace, Dial One, Joseph Lentine and Shannon Price and Erica Faaborg; meeting with Randy Williams and attend to GCWW payment; voicemails Mary Lee Bosom; emails Mr. Williams and Melissa Darby	2.00	600.00
6/27/22	attend to Dial One work at 637 Steiner	2.50	750.00
6/28/22	phone conference Joseph Lentine; email Ted Gable	.50	150.00
6/29/22	phone conferences Joseph Lentine, Kelly Alsesee and Jennifer Donathan	.50	150.00
6/30/22	conference Joseph Lentine; properties drive by	.80	240.00
7/1/22	emails Kelley Alsesee and Jennifer Donathan; review Port purchase contract; phone conferences Joseph Lentine	.50	150.00



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 Invoice No.: \*\*\*\*\*  
 Invoice Date: December 2, 2022  
 Page: 29

 Konza LLC  
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 12/5/22  
 revision
Work performed by Konza LLC as Receiver

DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
07/05/22	RB	Phone conferences Joseph Lentine and Jennifer Donathan; edit Port draft purchase agreement	0.50	175.00
07/06/22	RB	Phone conferences Marty Arlinghaus and Joseph Lentine; edit mark up of Port draft purchase agreement; email Kelley Allesee	1.20	420.00
07/07/22	RB	Edit rent roll; office conference Joseph Lentine; properties drive by; emails Melissa Darby	0.10	35.00
07/08/22	RB	Review receiver's monthly report and have filed and served; edit operating reports; phone and in person conference Joseph Lentine; phone conference and in person meeting Randy Williams; letter to Mr. Lentine' properties drive by	1.00	350.00
07/11/22	RB	Phone conferences Kelly Allesee and Joseph Lentine	0.50	175.00
07/12/22	RB	Office and phone conferences Joseph Lentine; prepare for and attend office conference Kelley Allesee	2.00	700.00
07/13/22	RB	Phone conference Joseph Lentine; draft motion to approve sale and order on same	1.00	350.00
10/19/22	RB	Phone conferences Joseph Lentine; emails St. Vincent De Paul, Jennifer Donathan, Kelley Allesee and Shannon Price; obtain Magistrate Berding signature to sale order and file	1.00	350.00
10/20/22	RB	Phone conferences Joseph Lentine	0.10	35.00
10/21/22	RB	Phone conferences Joseph Lentine	0.10	35.00
10/24/22	RB	Phone conferences Joseph Lentine and Kate Burroughs and Shannon Price; edit GCWW chart	0.30	105.00
10/25/22	RB	Emails Rhonda Dove; phone conferences and emails Joseph Lentine; internet and clerk of courts searches re John Klosterman arrest	0.20	70.00
10/26/22	RB	Phone conferences Joseph Lentine; emails Robert Hines , Kate Burroughs and Angel Strunk	0.30	105.00
10/27/22	RB	Emails Joseph Lentine and Rhonda Dove; phone conferences Mr. Lentine	0.10	35.00
10/28/22	RB	Phone conferences Joseph Lentine; emails Melissa Darby and Erin Lovitt; emails Robert Hines	0.30	105.00
10/31/22	RB	Phone conferences Joseph Lentine	0.10	35.00
11/01/22	RB	Phone conference Joseph Lentine; emails Erin Lovitt and Robert Hines (.20)	0.10	35.00
11/02/22	RB	Email Kate Burroughs; review health department reports; phone conferences Joseph Lentine (.70)	0.30	105.00
11/03/22	RB	Emails Rhonda Dove, Kate Burroughs; phone conferences Joseph Lentine (.30)	0.10	35.00
11/04/22	RB	Phone conference Joseph Lentine and Shannon Price; emails Angel Strunk, Erin Lovitt; review receiver report attachment and draft and serve report	0.60	210.00
11/07/22	RB	Office conference Joseph Lentine; properties drive by; edit operations charts; draft motion for approval and payment of receiver's fees and expenses; emails Angel Strunk, Mr. Lentine (1.50)	1.50	525.00
11/08/22	RB	Emails and phone conferences Kelley Allesee and Joseph Lentine; emails Mr. Lentine and Deanna White; edit fee and expense motion (.80)	0.70	245.00

date	description	time	amount
7/5/22	phone conferences Joseph Lentine and Jennifer Donathan; edit Port draft purchase agreement	.30	90.00
7/6/22	phone conferences Marty Arlinghaus and Joseph Lentine; edit mark up of Port draft purchase agreement; email Kelley Allesee	.80	240.00
7/7/22	edit rent roll; office conference Joseph Lentine; properties drive by; emails Melissa Darby	1.80	540.00
7/8/22	review receiver's monthly report and have filed and served; edit operating reports; phone and in person conference Joseph Lentine; phone conference and in person meeting Randy Williams; letter to Mr. Lentine' properties drive by	2.50	750.00
7/11/22	phone conferences Kelly Allesee and Joseph Lentine	.30	90.00
7/12/22	office and phone conferences Joseph Lentine; prepare for and attend office conference Kelley Allesee	1.00	300.00
7/13/22	phone conference Joseph Lentine; draft motion to approve sale and order on same	.20	60.00
10/19/22	phone conferences Joseph Lentine; emails St. Vincent De Paul, Jennifer Donathan, Kelley Allesee and Shannon Price; obtain Magistrate Berding signature to sale order and file	1.20	360.00
10/20/22	phone conferences Joseph Lentine	.10	30.00
10/21/22	phone conferences Joseph Lentine	.10	30.00
10/24/22	phone conferences Joseph Lentine and Kate Burroughs and Shannon Price; edit GCWW chart	.70	210.00
10/25/22	emails Rhonda Dove; phone conferences and emails Joseph Lentine; internet and clerk of courts searches re John Klosterman arrest	.40	120.00
10/26/22	phone conferences Joseph Lentine; emails Robert Hines , Kate Burroughs and Angel Strunk	.30	90.00
10/27/22	emails Joseph Lentine and Rhonda Dove; phone conferences Mr. Lentine	.10	30.00
10/28/22	phone conferences Joseph Lentine; emails Melissa Darby and Erin Lovitt; emails Robert Hines	.70	210.00
10/31/22	phone conferences Joseph Lentine	.10	30.00
11/1/22	phone conference Joseph Lentine; emails Erin Lovitt and Robert Hines	.20	60.00
11/2/22	email Kate Burroughs; review health department reports; phone conferences Joseph Lentine	.70	210.00
11/3/22	emails Rhonda Dove, Kate Burroughs; phone conferences Joseph Lentine	.30	90.00
11/4/22	phone conference Joseph Lentine and Shannon Price; emails Angel Strunk, Erin Lovitt; review receiver report attachment and draft and serve report	1.00	300.00
11/7/22	office conference Joseph Lentine; properties drive by; edit operations charts; draft motion for approval and payment of receiver's fees and expenses; emails Angel Strunk, Mr. Lentine	1.50	450.00
11/8/22	emails and phone conferences Kelley Allesee and Joseph Lentine; emails Mr. Lentine and Deanna White; edit fee and expense motion	.80	240.00



Dentons Bingham Greenebaum LLP

Konza LLC  
131170.000002Invoice No.: \*\*\*\*\*  
Invoice Date: December 2, 2022  
Page 2912/5/22  
revision

DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
11/09/22	RB	Phone conferences Joseph Lentine; emails Mr. Lentine, Angel Strunk, Deanna White; texts Ayman Nabi (.50)	0.20	70.00
11/10/22	RB	Phone conferences Joseph Lentine; texts Ayman Nabi; edit fee and expense motions; emails Jennifer	1.00	350.00

Work performed by Konza LLC as Receiver

date	description	time	amount
11/9/22	phone conferences Joseph Lentine; emails Mr. Lentine, Angel Strunk, Deanna White; texts Ayman Nabi	.50	150.00
11/10/22	phone conferences Joseph Lentine; texts Ayman Nabi; edit fee and expense motions; emails Jennifer Donathan, Kate Burroughs	.70	210.00



Exhibit-B

**IN THE COURT OF COMMON PLEAS  
HAMILTON COUNTY, OHIO**

**CITY OF CINCINNATI,**

**Plaintiff,**

**vs.**

**JOHN KLOSTERMAN,**

**Defendant, et al.**

**Case No. A1905588**

**Judge Wende C. Cross**

**MAGISTRATE'S ORDER**

Before the Court is Defendant John Klosterman's request for ruling on his motion to audit, filed March 29, 2022. The Court finds that the motion is not well taken. Therefore, Mr. Klosterman's motion is denied as moot.

**IT IS SO ORDERED.**

  
**ANITA BERDING  
CHIEF MAGISTRATE  
COURT OF COMMON PLEAS**

2023 MAR 15 10:33  
HAMILTON COUNTY, OH  
CLERK OF COURTS  
COMMON PLEAS

Exhibit C

IN THE COURT OF COMMON PLEAS  
HAMILTON COUNTY, OHIO

CITY OF CINCINNATI,

Plaintiff,

vs.

JOHN KLOSTERMAN,

Defendant, et al.

: Case No. A1905588

: Judge Wende C. Cross

: MAGISTRATE'S ORDER

Before the Court is Defendant John Klosterman's motion to Order Agent of City Richard-Boydston to Sit for Deposition and Dismiss Without Prejudice and Audits, filed March 23, 2022. The Court finds that the motion is not well taken. Therefore, Mr. Klosterman's motion is denied.

IT IS SO ORDERED.

  
ANITA BERDING  
CHIEF MAGISTRATE  
COURT OF COMMON PLEAS

2023 MAR 15 A 8:33

CLERK OF COURTS  
HAMILTON COUNTY, OH  
COMMON PLEAS



Exhibit D

IN THE COURT OF COMMON PLEAS  
HAMILTON COUNTY, OHIO

CITY OF CINCINNATI,

Plaintiff,

vs.

JOHN KLOSTERMAN,

Defendant, et al.

: Case No. A1905588

: Judge Wende C. Cross

: MAGISTRATE'S ORDER

Before the Court is Defendant John Klosterman's motion for Hearing and Report of Fraud, Removal of TSO, and Dismissal of Suit, filed April 28, 2022. The Court finds that the motion is not well taken. Therefore, Mr. Klosterman's motion is denied.

IT IS SO ORDERED.

  
ANITA BERDING  
CHIEF MAGISTRATE  
COURT OF COMMON PLEAS

2023 MAR 15 A 8:33

CLERK OF COURTS  
HAMILTON COUNTY, OH  
COMMON PLEAS